

**To:** Shine, Brenda[Shine.Brenda@epa.gov]  
**Cc:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Mon 1/16/2017 11:11:14 PM  
**Subject:** EPA ICR Parts 1 & 2 – Facility IDs 1594650 & 1594700

With regard to the captioned subject, given current work demands along with the complexities attendant upon data attainments for said parts, Seneca Resources is petitioning the EPA for a 60-day extension for Part 1 and a 90-day extension for Part 2.

Regards,

Ex. 6 - Personal Privacy

Senior Advisor, EHSQ

Seneca Resources

Ex. 6 - Personal Privacy

Bakersfield, CA 93311

Telephone: Ex. 6 - Personal Privacy

Cell Phone: Ex. 6 - Personal Privacy

Fax: Ex. 6 - Personal Privacy

E-mail: Ex. 6 - Personal Privacy@srcx.com

**To:** [Ex. 5 - Personal Privacy]@ajaxres.com [Ex. 5 - Personal Privacy]@ajaxres.com]  
**Cc:** ICR[ICR@epa.gov]  
**From:** Carey, Angela  
**Sent:** Tue 1/17/2017 5:17:45 PM  
**Subject:** 60 day extension for: 1012550

[Ex. 5 - Personal Privacy]

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of letter. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 5:04:41 PM  
**Subject:** FW: ICR

**From:** [Ex. 6 - Personal Privacy]@stoutexcavatinginc.com]  
**Sent:** Tuesday, January 17, 2017 10:31 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR

Ms. Brenda Shine

U.S. Environmental Protection Agency

109 T.W. Alexander Drive, Mail Code: E143-01

Research Triangle Park, NC 27709

I would like to request a 60 day extension to obtain the required information on the EPA ICR Survey.

My apologies for such short notice, I just received all the paperwork today, as the company is

in process of restructuring our internal accounting system.

Thank you in advance for your understanding of this situation.


[Ex. 6 - Personal Privacy]

Stout Excavating, Inc.

[Ex. 6 - Personal Privacy]

Wooster, OH 44691

Ex. 6 - Personal Privacy

@stoutexcavatinginc.com

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 5:02:27 PM  
**Subject:** FW: EPA INFORMATION COLLECTION REQUEST

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@AOL.COM]  
**Sent:** Tuesday, January 17, 2017 11:09 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** EPA INFORMATION COLLECTION REQUEST

To Whom It May Concern:

We are in receipt of the above referenced information request for the following facilities:

- 1) Gaines Operating, LLC, Facility #1249250;
- 2) Fossil Energy, Inc., Facility #1240000;
- 3) Fitzgerald Production Co., Facility #123400;
- 4) R. L. Davis, Facility #1536650;
- 5) Caddo Pine Island Oil & Hist. Soc., Facility #1103350

We are herein requesting an extension until March 1, 2017, to complete Part 1 of the survey and an extension until July 1, 2017 to complete Part 2 of the survey. We are requesting these extensions due to the volume of information requested and the [Ex. 4 - CBI] complete the survey. Our industry has experience difficult financial times over the last two years

[Ex. 4 - CBI]

[Ex. 4 - CBI] The information requested, and in particular, the Longitude and Latitude of each well and facility is not information we have on file and will require onsite surveys to collect this information. In addition we have yearend obligations regarding our IRS requirements and forms due and simply do not have [Ex. 4 - CBI] to meet the pending deadline for completing the EPA survey.

Your help and cooperation in granting these extensions will be greatly appreciated.

Ex. 6 - Personal Privacy

President/Manager

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 5:02:26 PM  
**Subject:** FW: ICR Extension Request  
ICR Extension Request Letter.PDF

**From:** Toomey Oil Co. [mailto:[REDACTED]@toomeyoil.com]  
**Sent:** Tuesday, January 17, 2017 11:16 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR Extension Request

Hello Ms. Shine,

Please find attached a formal extension request letter which has also been sent via postal service.

Toomey Oil is a [REDACTED] **Ex. 4 - CBI** [REDACTED] We are in the process of compiling the requested information but have realized we will be unable to appropriately and accurately acquire all the data prior to the original deadline.

I have provided further detail in the letter. If you could please grant this request we would be most grateful.

Best,

[REDACTED]  
**Ex. 6 - Personal Privacy**

**TOOMEY OIL CO., INC.**

Ex. 6 - Personal Privacy

**Tulsa, OK 74101**

**Phone:**

Ex. 6 - Personal Privacy

**Fax:**

Ex. 6 - Personal Privacy



**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 5:02:05 PM  
**Subject:** FW: ICR extension

**From:** [Ex. 6 - Personal Privacy]@srwinc.com]  
**Sent:** Tuesday, January 17, 2017 11:31 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR extension

Hello Brenda,

SRW Inc. wishes to request an extension in completing the EPA methane emission ICR survey. We are [Ex. 4 - CBI] and have found it difficult to fully complete in the time frame set. If we could receive an additional 90 days to complete it would be appreciated. Note our primary facility ID is 1623500.

Thank you

[Ex. 6 - Personal Privacy]

SRW Inc.

Superintendent – Gaylord

[Ex. 6 - Personal Privacy]

- FAX

**To:** ICR[ICR@epa.gov]  
**Cc:** Ex. 6 - Personal Privacy [redacted]@zanetisoil.com]; Ex. 6 - Personal Privacy [redacted]@zanetisoil.com]  
**From:** Ex. 6 - Personal Privacy [redacted]  
**Sent:** Tue 1/17/2017 4:04:19 PM  
**Subject:** RE: Oil and Gas Information Collection Request

The Primary Facility ID is 1737450

Address:

Zanetis Oil Company, LLC

Ex. 6 - Personal Privacy [redacted]

Mt. Carmel, IL 62863

Please let me know if you need anything else regarding the extension.

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Friday, January 13, 2017 4:16 PM  
**To:** Ex. 6 - Personal Privacy [redacted]@zanetisoil.com>  
**Cc:** Ex. 6 - Personal Privacy [redacted]@zanetisoil.com>; Ex. 6 - Personal Privacy [redacted]@zanetisoil.com>; ICR <ICR@epa.gov>  
**Subject:** RE: Oil and Gas Information Collection Request

Ex. 6 - Personal Privacy [redacted]

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the Primary Facility ID and verify your address, so that we may mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 3:54 PM  
**To:** ICR <[ICR@epa.gov](mailto:ICR@epa.gov)>  
**Subject:** FW: Oil and Gas Information Collection Request

**From:** Ex. 6 - Personal Privacy [REDACTED]@zanetisoil.com]  
**Sent:** Friday, January 13, 2017 3:52 PM  
**To:** Tsirigotis, Peter <[Tsirigotis.Peter@epa.gov](mailto:Tsirigotis.Peter@epa.gov)>; Shine, Brenda <[Shine.Brenda@epa.gov](mailto:Shine.Brenda@epa.gov)>  
**Cc:** Ex. 6 - Personal Privacy [REDACTED]@zanetisoil.com>; Ex. 6 - Personal Privacy [REDACTED]@zanetisoil.com>  
**Subject:** Oil and Gas Information Collection Request

Good afternoon,

Zanetis Oil Company, LLC received the ICR from the United States Environmental Protection agency in the first week of December, 2016. At this time we would like to ask for a 60 day extension for all parts included. It is the company's intention to comply with all information requested.

Ex. 4 - CBI [REDACTED] Ex. 4 - CBI [REDACTED]  
Ex. 4 - CBI [REDACTED] We are also still in the process of acquiring well files and information on properties purchased in mid to late 2016. The 60 day extension would allow us the time to gather the needed information to complete the ICR. If there is anything further we can provide, please contact us via email.


Regards,

Ex. 6 - Personal Privacy

Geologist

Zanetis Oil Company, LLC

Ex. 6 - Personal Privacy

@zanetisoil.com

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:51:40 PM  
**Subject:** FW: ICR Deadline Extension Request

**From:** [Ex. 6 - Personal Privacy]@custerwright.com]  
**Sent:** Monday, January 16, 2017 5:21 PM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR Deadline Extension Request

Ms. Shine,

In order to ensure accuracy in the data we will be sending, I am writing to request a 30 day extension to the filing deadline of Part 1 of our ICR requirement.

I look forward to hearing back from you.

Kind Regards,

[Ex. 6 - Personal Privacy]

Engineer



Custer & Wright Operating, Inc.

[Ex. 6 - Personal Privacy]

[Ex. 6 - Personal Privacy]

Midland, Texas 79702

Office **Ex. 6 - Personal Privacy**

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:51:21 PM  
**Subject:** FW: Request for extension of time to respond to the oil & natural gas sector ICR, MWP, Inc.  
Facility ID # 1424250  
[20170116155123.pdf](#)

**From:** **Ex. 6 - Personal Privacy** [redacted]@mcgowanwp.com]  
**Sent:** Monday, January 16, 2017 5:13 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Request for extension of time to respond to the oil & natural gas sector ICR, MWP, Inc. Facility ID # 1424250

Mr. Tsirigotis,

Please find attached a copy of McGowan Working Partners, Inc. letter respectfully requesting an extension of time to complete the EPA Oil & Gas sector ICR survey. A hard copy is also being sent to your attention and I have also courtesy copied Ms. Brenda Shine as well as I am sure that the influx of requests are overwhelming at this point.

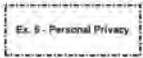
If you have any questions or concerns please do not hesitate to contact me at any time, thank you for your time and consideration in this matter.

Sincerely,

**Ex. 6 - Personal Privacy** [redacted]

MWP, Inc.

**To:** [REDACTED]@buffcoproduction.com [REDACTED]@buffcoproduction.com]  
**Cc:** ICR[ICR@epa.gov]  
**From:** Carey, Angela  
**Sent:** Tue 1/17/2017 4:12:04 PM  
**Subject:** 60 day extension granted for ID: 1093600



We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>



**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:42:13 PM  
**Subject:** FW: Extension Request  
[image2017-01-16-081622.pdf](#)

-----Original Message-----

**From:** Ex. 6 - Personal Privacy @gmail.com [mailto:[Ex. 6 - Personal Privacy @gmail.com](#)]  
**Sent:** Monday, January 16, 2017 3:16 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Extension Request

This is your scanned document from Creston Well Service.

**To:** [Ex. 6 - Personal Privacy]@gmail.com [Ex. 6 - Personal Privacy]@gmail.com  
**Cc:** ICR[ICR@epa.gov]  
**From:** ICR  
**Sent:** Tue 1/17/2017 3:17:06 PM  
**Subject:** RE: Extension Request

[Ex. 6 - Personal Privacy]

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the Primary Facility ID from your letter and verify your address, so that we may mail you a confirmation letter.

I apologize for the information being a little scary, but we are here to help. If you only have a couple of wells, I can ask you a few simple questions and fill out the survey for you. We also have a Help Desk (phone number listed below) as well as this email address to help you answer any questions you may have. Additionally, if you do not have access to the internet or are not internet savvy, we can mail you a hardcopy of the survey to fill out. We also have a webinar that may be helpful here:  
<https://youtu.be/WjobN2yCJHs>

Please let me know if you have any additional questions. We would be happy to help walk you through these forms.

Thank you,

ICR Help Desk  
US Environmental Protection Agency  
ICR@epa.gov  
1-888-372-8696  
Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

-----Original Message-----

From: Shine, Brenda  
Sent: Tuesday, January 17, 2017 9:42 AM  
To: ICR <ICR@epa.gov>  
Subject: FW: Extension Request

-----Original Message-----

From: [Ex. 6 - Personal Privacy]@gmail.com [mailto:[Ex. 6 - Personal Privacy]@gmail.com]  
Sent: Monday, January 16, 2017 3:16 AM  
To: Shine, Brenda <Shine.Brenda@epa.gov>  
Subject: Extension Request

This is your scanned document from Creston Well Service.

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:57:03 PM  
**Subject:** FW: ICR Part 1 Extension Request-Muskegon Development Company  
ICR Extension Request MDC.pdf

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@muskegondevelopment.com]  
**Sent:** Tuesday, January 17, 2017 9:13 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR Part 1 Extension Request-Muskegon Development Company

Dear Mr. Tsirigotis,

Attached is our letter requesting an extension of 60 days to respond to the ICR Part 1 request. Given the pending original response date of February 3<sup>rd</sup> I am hoping that you are able to review this in a timely manner. Thank you for your consideration.

Respectfully yours,

[Ex. 6 - Personal Privacy]

Vice President

Muskegon Development Company

[Ex. 6 - Personal Privacy] Traverse City, Michigan 49684

[Ex. 6 - Personal Privacy]

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:56:52 PM  
**Subject:** FW: Oil and Gas Reporting for CAA  
[Scan0001.pdf](#)

-----Original Message-----

**From:** Ex: 6 - Personal Privacy [mailto: [redacted]@rrorio.com]  
**Sent:** Tuesday, January 17, 2017 9:03 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Oil and Gas Reporting for CAA

Your message is ready to be sent with the following file or link attachments:

Scan0001

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:54:08 PM  
**Subject:** FW: ICR Deadline Extension Request Marathon Oil Corporation

**From:** Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy@marathonoil.com]  
**Sent:** Tuesday, January 17, 2017 8:43 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Cc:** Ex. 6 - Personal Privacy <Ex. 6 - Personal Privacy@marathonoil.com>  
**Subject:** ICR Deadline Extension Request Marathon Oil Corporation

Brenda,

The purpose of this email is to request an additional ninety-day extension to submit the Part 2 Information Collection Request (ICR) response for Marathon Oil Corporation (Marathon). Marathon appreciates the agency's need to gather this information and wants to ensure that the data is as accurate as possible. Unfortunately, the Part 2 data gathering will occur simultaneously with our annual criteria pollutant and greenhouse gas emission inventory reporting as well as with implementation of NSPS OOOOa LDAR requirements. We received our first letter ICR Section 114 letter on December 5, 2016; therefore, Marathon respectfully requests an extension to July 5, 2017 to submit its Part 2 response. By granting this extension, EPA will be giving our company much-needed additional time to respond to the ICR. Please be advised that we intend to submit our Part 1 response by its due date.

Regards,

Ex. 6 - Personal Privacy

Environmental & Regulatory Compliance Manager

Corporate HES&S

Marathon Oil Company

**Ex. 6 - Personal Privacy**

Houston, Texas 77056-2799

Phone: Ex. 6 - Personal Privacy

Mobile: Ex. 6 - Personal Privacy



**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:54:05 PM  
**Subject:** FW: National Fuel Gas Dist. Corp.: Request for Extension  
DOC011717-01172017082807.pdf

-----Original Message-----

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@natfuel.com]  
**Sent:** Tuesday, January 17, 2017 8:41 AM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Cc:** [Ex. 6 - Personal Privacy] <[Ex. 6 - Personal Privacy]@natfuel.com>; [Ex. 6 - Personal Privacy] <[Ex. 6 - Personal Privacy]@natfuel.com>  
**Subject:** National Fuel Gas Dist. Corp.: Request for Extension

Ms. Shine:

Please see the attached letter requesting an extension of the ICR deadline. Please feel free to contact me at this email or the number below if you have any questions or need additional information.

Thank you for your time and consideration.

[Ex. 6 - Personal Privacy]  
Engineer II, Risk Management Department  
National Fuel Gas  
[Ex. 6 - Personal Privacy] [Ex. 6 - Personal Privacy]  
Erie, PA, 16512  
ph: [Ex. 6 - Personal Privacy]

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:51:08 PM  
**Subject:** FW: ICT Part 1 Extension Request  
ICR Extension Request 01162017.pdf

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@discoverynr.com]  
**Sent:** Monday, January 16, 2017 5:13 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICT Part 1 Extension Request

Peter,

Our extension request is attached for your information and consideration. Please advise if questions.

Thank you

[Ex. 6 - Personal Privacy]

VP Risk Management

Discovery Natural Resources

Office [Ex. 6 - Personal Privacy]

Cell [Ex. 6 - Personal phone]

The information transmitted, including attachments, is intended only for the person(s) or



entity to which it is addressed and may contain privileged material. If you have received this information in error, please reply to address above and delete this email from your system.

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:50:26 PM  
**Subject:** FW: CAA ICR - Facility ID: 1179900 - request for extension  
EPA - CAA request for extension - 160116.pdf

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@denaliexploration.com]  
**Sent:** Monday, January 16, 2017 4:44 PM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** CAA ICR - Facility ID: 1179900 - request for extension

Ms. Shine,

Attached is a request for extension for the CAA ICR . The original will be mailed tomorrow by certified mail.

Thank you for your consideration of this request.

[Ex. 6 - Personal Privacy]

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Tue 1/17/2017 2:50:13 PM  
**Subject:** FW: EPA OIL WELL INFORMATION

-----Original Message-----

**From:** Ex. 6 - Personal Privacy @wildblue.net [mailto:Ex. 6 - Personal Privacy @wildblue.net]  
**Sent:** Monday, January 16, 2017 4:27 PM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** EPA OIL WELL INFORMATION

Hi,

I am writing concerning the Oil & Gas Information Collection Request that you sent me. I am emailing to ask for an extension. I have been trying to work on this as well as try to do my other duties for our company. I am overwhelmed at all the information that you are requiring and am unable to submit it by the required timeframe.

I would please like an extension.

Thank you for your time and cooperation in this matter.

Sincerely yours,

Ex. 6 - Personal Privacy  
Harmon O G LLC

**To:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Sat 1/14/2017 10:27:27 PM  
**Subject:** RE: From True Oil LLC - Extension Oil And Gas ICR  
EPA Part 1 Request Ltr 12.5.16.pdf

Brenda/ICR Help Desk,

I appreciate your consideration for the extension and allowing 120 days for completion of Part 1 of the ICR reporting requirements. The Primary Facility ID is 1678850. My address is:

Ex. 6 - Personal Privacy

TRUE OIL, LLC

Ex. 6 - Personal Privacy

Casper, Wyoming 82602-2360

I have attached a scanned copy of the certified letter received December 5, 2016 requesting the provision of the information as described in the letter for the ICR being conducted by the EPA.

Thank you again for your consideration.

Ex. 6 - Personal Privacy

Assistant Environmental Coordinator

True Companies

Ex. 6 - Personal Privacy

Casper, WY 82602

Ex. 6 - Personal Privacy (Cell)

Ex. 6 - Personal Privacy (Office)

E-mail: Ex. 6 - Personal Privacy @Truecos.com

A "Read Receipt" is being requested with this e-mail.

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Thursday, January 12, 2017 3:52 PM  
**To:** Ex. 6 - Personal Privacy  
**Subject:** Re: From True Oil LLC - Oil And Gas ICR

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the Primary Facility ID and verify your address, so that we may send you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

---

**From:** Shine, Brenda  
**Sent:** Thursday, January 12, 2017 6:08 PM  
**To:** ICR  
**Subject:** FW: From True Oil LLC - Oil And Gas ICR

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@Truecos.com]  
**Sent:** Thursday, January 12, 2017 12:35 PM  
**To:** cob@rti.org; Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** From True Oil LLC - Oil And Gas ICR

Jeff/Brenda,

True Oil LLC has received the certified letters from the EPA requesting completion of Part 1 and Part 2 of the ICR for their crude and natural gas extraction facilities and gathering and boosting facilities. True Oil LLC has begun this process to satisfy the EPA's requirements. However, due to multiple other regulatory reporting requirements, True Oil LLC would like to request a 60 day extension in order to complete Part 1 of the ICR. The first few months of every year are extremely busy for True Oil LLC with the various reporting requirements for GHG, Quad Oa and several layers of individual state reports required by the states that True Oil has operations in.

True Oil respectfully appreciates your consideration for the extension. If you require additional information please let me know.

Thank you.

[Ex. 6 - Personal Privacy]

Assistant Environmental Coordinator

True Companies

[Ex. 6 - Personal Privacy]

Casper, WY 82602

[Ex. 6 - Personal phone] (Cell)

[Ex. 6 - Personal Privacy] (Office)

E-mail: [Ex. 6 - Personal Privacy]@Truecos.com

A "Read Receipt" is being requested with this e-mail.

**To:** [REDACTED]@sbcglobal.net [REDACTED]@sbcglobal.net]  
**Cc:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 11:09:00 PM  
**Subject:** Your hard copy and extension request  
[part-1-survey-opt-2.pdf](#)

Hi [REDACTED]

Attached is the PDF hard copy of the operator survey that you can fill out by hand and return to us.

Also, we are granting you a 60 day extension for submittal (from the date you received your original letter).

Finally, here is a weblink to resources for help in filling this out:

<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/resources-ownersoperators-responding>

Thanks for following up with us.

**To:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Fri 1/13/2017 10:46:40 PM  
**Subject:** Re: Toro Exploration Company requests extension

Thank you

----- Forwarded message -----

**From:** ICR <ICR@epa.gov>  
**Date:** Fri, Jan 13, 2017 at 4:30 PM  
**Subject:** RE: Toro Exploration Company requests extension  
**To:** "Ex. 6 - Personal Privacy" <[REDACTED]@gmail.com> <Ex. 6 - Personal Privacy [REDACTED]@gmail.com>  
**Cc:** ICR <ICR@epa.gov>

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

[1-888-372-8696](tel:1-888-372-8696)

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 4:08 PM  
**To:** ICR <ICR@epa.gov>  
**Subject:** FW: Toro Exploration Company requests extension



**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@gmail.com]

**Sent:** Friday, January 13, 2017 4:07 PM

**To:** ICR <ICR@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>

**Subject:** Toro Exploration Company requests extension

January 13, 2017

Toro Exploration Company Operator # 1669800 is requesting an extension for compliance with ICR. [Ex. 6 - Personal Privacy] and year end reporting has hampered our ability to comply with the 60 day request. We are making every effort to work towards fulfilling this request.

Please let me know that we have been approved for an extension and if you have any additional questions.

Yours truly,

[Ex. 6 - Personal Privacy]

Toro Exploration

**To:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Fri 1/13/2017 10:19:43 PM  
**Subject:** Re: ICR Extension

Ms. Shine,

Our mailing address is Ex. 6 - Personal Privacy Lubbock, TX 79408. Our primary facility ID is 1207850.

Thanks,

Ex. 6 - Personal Privacy  
El Ran, Inc.  
Production Analyst  
O: Ex. 6 - Personal Privacy  
C: Ex. 6 - Personal phone

---

**From:** ICR <ICR@epa.gov>  
**To:** Ex. 6 - Personal Privacy @yahoo.com" <Ex. 6 - Personal Privacy @yahoo.com>  
**Cc:** ICR <ICR@epa.gov>  
**Sent:** Friday, January 13, 2017 4:09 PM  
**Subject:** RE: ICR Extension

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide the Primary Facility ID and verify your address, so that we may mail you a confirmation letter.

Thank you,

ICR Help Desk  
US Environmental Protection Agency  
[ICR@epa.gov](mailto:ICR@epa.gov)  
1-888-372-8696  
Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 3:45 PM  
**To:** ICR <ICR@epa.gov>  
**Subject:** FW: ICR Extension

**From:** Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy @yahoo.com]

**Sent:** Friday, January 13, 2017 3:43 PM  
**To:** Shine, Brenda <[Shine.Brenda@epa.gov](mailto:Shine.Brenda@epa.gov)>  
**Subject:** ICR Extension

Ms. Shine,

I'm with El Ran, Inc. an Oil and Gas operator/producer out of Lubbock, Texas and we were trying to get approval on a 30 day extension for part 1 of the ICR. This extension we feel would give us time to gather all the necessary information. I look forward to your response.

Thanks,

Ex. 6 - Personal Privacy  
El Ran, Inc.  
Production Analyst  
☐ Ex. 6 - Personal Privacy  
☒ Ex. 6 - Personal phone

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 9:43:31 PM  
**Subject:** FW: ICR Extension Request for Fasken Oil and Ranch, Ltd  
20170113152006.pdf

**From:** Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy@forl.com]  
**Sent:** Friday, January 13, 2017 4:27 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR Extension Request for Fasken Oil and Ranch, Ltd

Mr. Tsirigotis and Ms. Shine,

Please see the attached ICR extension request for Fasken Oil and Ranch. Please confirm receipt.

If you have any questions, please contact Ex. 6 - Personal Privacy or myself.

Thank You,



Ex. 6 - Personal Privacy

Environmental Coordinator

Fasken Oil and Ranch, Ltd.

Ex. 6 - Personal Privacy

Midland, TX 79707

Ex. 6 - Personal Privacy Office

Ex. 6 - Personal phone Cell

**From:** Ex. 6 - Personal Privacy

**Sent:** Friday, January 13, 2017 3:23 PM

**To:** Ex. 6 - Personal Privacy <[REDACTED]@forl.com>

**Subject:** ICR Extension Request - Part 1

Attached.

Ex. 6 - Personal Privacy



Ex. 6 - Personal Privacy

Midland, TX 79707

Ex. 6 - Personal Privacy office

Ex. 6 - Personal phone cell

**To:** ICR[ICR@epa.gov]  
**From:** Quail Well Service  
**Sent:** Fri 1/13/2017 9:41:34 PM  
**Subject:** RE: Extension

Thank you!!!! Our Primary Facility ID is 1531500 and our mailing address is  
Abilene, TX 79604-2557

Ex. 6 - Personal Privacy

Hope you have a wonderful weekend!

Ex. 6 - Personal Privacy

Office Manager

Quail Well Service, Inc.

Email: [redacted]@quailwellservice.com

Office: [redacted]

Fax: [redacted]

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Friday, January 13, 2017 2:55 PM  
**To:** [redacted]@quailwellservice.com  
**Cc:** ICR <ICR@epa.gov>  
**Subject:** RE: Extension

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the Primary Facility ID from

your letter, and verify your address, so that we may mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 3:33 PM  
**To:** ICR <[ICR@epa.gov](mailto:ICR@epa.gov)>  
**Subject:** FW: Extension

**From:** Quail Well Service [[mailto:\[REDACTED\]@quailwellservice.com](mailto:[REDACTED]@quailwellservice.com)]  
**Sent:** Friday, January 13, 2017 1:42 PM  
**To:** Shine, Brenda <[Shine.Brenda@epa.gov](mailto:Shine.Brenda@epa.gov)>  
**Subject:** Extension

Good afternoon! I have been looking at the survey we are needing to submit and am not quite understanding everything on it. I am still learning everything with oil and gas wells so it takes me a little longer to grasp concepts. Also, I have been getting all of the end of year information gathered and processed, so my full attention has not been on the survey. The deadline came

quicker than I expected. Could we please have an extension on submitting the survey? Is there something else we need to submit for an extension request? Please let me know if you need any further information or if I need to direct this elsewhere.

Thank you!

Ex. 6 - Personal Privacy

Office Manager

Quail Well Service, Inc.

Email: [redacted]@quailwellservice.com

Office: Ex. 6 - Personal Privacy

Fax: Ex. 6 - Personal Privacy



**To:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Fri 1/13/2017 9:35:52 PM  
**Subject:** RE: Texland Petroleum, L.P. ICR Request

Thank you so much. What about for Part 2?

Thanks,

Ex. 6 - Personal Privacy

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Friday, January 13, 2017 3:26 PM  
**To:** Ex. 6 - Personal Privacy  
**Cc:** ICR  
**Subject:** RE: Texland Petroleum, L.P. ICR Request

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. We will mail you a confirmation letter.

Yes, you may use 1657500 to report all of your wells. I will make a note in my records that 1657550 is a duplicate.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 3:36 PM  
**To:** ICR <[ICR@epa.gov](mailto:ICR@epa.gov)>  
**Subject:** FW: Texland Petroleum, L.P. ICR Request  
**Importance:** High

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@texpetro.com]  
**Sent:** Friday, January 13, 2017 3:29 PM  
**To:** Tsirigotis, Peter <[Tsirigotis.Peter@epa.gov](mailto:Tsirigotis.Peter@epa.gov)>; Shine, Brenda <[Shine.Brenda@epa.gov](mailto:Shine.Brenda@epa.gov)>  
**Subject:** Texland Petroleum, L.P. ICR Request  
**Importance:** High

Good Afternoon,

I have attached a letter to request an extension regarding Part 1 and Part 2 of the ICR. Texland is a small operating company [Ex. 4 - CBI]  
[Ex. 4 - CBI] Again, please see letter attached and let me know if we our granted approval along with any new due dates. Also, we were mailed two packets with two different Facility ID # 1657550 and 1657500. We are just one company and that is the Texland Petroleum, L.P. Our New Mexico (Hobbs) follows under the same name. Can I just use the 1657500 ID to represent both Texas and New Mexico on the same spreadsheet? Please, let me know.

Thanks so much,

Ex. 6 - Personal Privacy

Regulatory Analyst

Texland Petroleum

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

@texpetro.com

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 9:14:43 PM  
**Subject:** FW: Request for Extension of Time ICR Facility ID 1765500  
[Request for Extension ICR.pdf](#)

**From:** Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy@gmail.com]  
**Sent:** Friday, January 13, 2017 4:09 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Request for Extension of Time ICR Facility ID 1765500

Re: Facility ID 1765500 Wisckaemper, Kenneth

Dear Mr. Tsirigotis,

Please find attached our request for extension of time to respond to the Oil and Natural Gas Sector ICR.

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy 1765500

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 9:08:27 PM  
**Subject:** FW: Toro Exploration Company requests extension

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@gmail.com]  
**Sent:** Friday, January 13, 2017 4:07 PM  
**To:** ICR <ICR@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Subject:** Toro Exploration Company requests extension

January 13, 2017

Toro Exploration Company Operator # 1669800 is requesting an extension for compliance with ICR. [Ex. 6 - Personal Privacy] and year end reporting has hampered our ability to comply with the 60 day request. We are making every effort to work towards fulfilling this request.

Please let me know that we have been approved for an extension and if you have any additional questions.

Yours truly,

[Ex. 6 - Personal Privacy]

Toro Exploration

**To:** ICR[ICR@epa.gov]; Shine, Brenda[Shine.Brenda@epa.gov]; Tsirigotis, Peter[Tsirigotis.Peter@epa.gov]  
**From:** [Ex. 6 - Personal Privacy]  
**Sent:** Fri 1/13/2017 9:07:10 PM  
**Subject:** Toro Exploration Company requests extension

January 13, 2017

Toro Exploration Company Operator # 1669800 is requesting an extension for compliance with ICR. [Ex. 6 - Personal Privacy] and year end reporting has hampered our ability to comply with the 60 day request. We are making every effort to work towards fulfilling this request.

Please let me know that we have been approved for an extension and if you have any additional questions.

Yours truly,

[Ex. 6 - Personal Privacy]  
Toro Exploration

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:54:10 PM  
**Subject:** FW: Oil and Gas Information Collection Request

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@zanetisoil.com]  
**Sent:** Friday, January 13, 2017 3:52 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>  
**Cc:** [Ex. 6 - Personal Privacy] <[Ex. 6 - Personal Privacy]@zanetisoil.com>; [Ex. 6 - Personal Privacy] <[Ex. 6 - Personal Privacy]@zanetisoil.com>  
**Subject:** Oil and Gas Information Collection Request

Good afternoon,

Zanetis Oil Company, LLC received the ICR from the United States Environmental Protection agency in the first week of December, 2016. At this time we would like to ask for a 60 day extension for all parts included. It is the company's intention to comply with all information requested, but [Ex. 4 - CBI]

[Ex. 4 - CBI] We are also still in the process of acquiring well files and information on properties purchased in mid to late 2016. The 60 day extension would allow us the time to gather the needed information to complete the ICR. If there is anything further we can provide, please contact us via email.

Regards,

[Ex. 6 - Personal Privacy]

Geologist

Zanetis Oil Company, LLC

[Ex. 6 - Personal Privacy]

[Ex. 6 - Personal Privacy]@zanetisoil.com





**To:** [Ex. 6 - Personal Privacy]@ebresources.com]  
**Cc:** ICR[ICR@epa.gov]  
**From:** Witosky, Matthew  
**Sent:** Fri 1/13/2017 8:50:10 PM  
**Subject:** RE: extension confirmation

We don't have a record for Hillcrest Beverly Oil Corporation, Los Angeles. Since they are not in our system, they have not been sent a letter.

We are not sending a second round of letters at this time, so that company is not required to respond to your request.

Thank you,

Matthew

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@ebresources.com]  
**Sent:** Friday, January 13, 2017 3:32 PM  
**To:** Witosky, Matthew <Witosky.Matthew@epa.gov>  
**Subject:** RE: extension confirmation

Hello Mr. Witosky:

Thank you for your help in granting an extension.

As I mentioned to you during our phone conversation, we did not receive a request letter for Hillcrest Beverly Oil Corporation, Los Angeles. I am concerned that it may have gone to a wrong address. Could you please check at your end and grant an extension to that facility too?

Thank you again.

Best regards,

Ex. 6 - Personal Privacy

Manager HSE



E&B Natural Resources

Ex. 6 - Personal Privacy

Bakersfield, CA 93308

Phone:

Office: Ex. 6 - Personal Privacy

Cell: Ex. 6 - Personal phone

**From:** Witosky, Matthew [mailto:Witosky.Matthew@epa.gov]

**Sent:** Friday, January 13, 2017 12:07 PM

**To:** Ex. 6 - Personal Privacy

**Cc:** ICR

**Subject:** extension confirmation

Hello

Ex. 6 - Personal Privacy

This is confirmation that Angus Petroleum, E & B Natural Resource Management, and Elysium Jennings have received a 60 day extension to respond to EPA's Information Collection Request, Part 1. You now have 120 days from the day the certified letter was received. Most letters were received in the first week of December of 2016.

If you need an extension for part 2, should any facilities be selected for part 2, please contact us again at 888-372-8696.

Written confirmation of your extension will be sent by US mail.

Thank you for your help in completing our request for information. Contact us again if you need further assistance. Questions may also be directed to our email address for the ICR, which is [ICR@EPA.GOV](mailto:ICR@EPA.GOV)

Matthew Witosky

Fuels and Incineration Group

Sector Policies and Programs Division

Office of Air Quality Planning and Standards

EPA, RTP NC

919-541-2865

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:44:32 PM  
**Subject:** FW: ICR Extension

**From:** Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy@yahoo.com]  
**Sent:** Friday, January 13, 2017 3:43 PM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** ICR Extension

Ms. Shine,

I'm with El Ran, Inc. an Oil and Gas operator/producer out of Lubbock, Texas and we were trying to get approval on a 30 day extension for part 1 of the ICR. This extension we feel would give us time to gather all the necessary information. I look forward to your response.

Thanks,

Ex. 6 - Personal Privacy

El Ran, Inc.

Production Analyst

O Ex. 6 - Personal Privacy

C Ex. 6 - Personal phone

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:35:58 PM  
**Subject:** FW: Texland Petroleum, L.P. ICR Request  
20170113141323220.pdf

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@texpetro.com]  
**Sent:** Friday, January 13, 2017 3:29 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Texland Petroleum, L.P. ICR Request  
**Importance:** High

Good Afternoon,

I have attached a letter to request an extension regarding Part 1 and Part 2 of the ICR. Texland is a small operating company and we only [Ex. 4 - CBI] able to work on the ICR request. Again, please see letter attached and let me know if we our granted approval along with any new due dates. Also, we were mailed two packets with two different Facility ID # 1657550 and 1657500. We are just one company and that is the Texland Petroleum, L.P. Our New Mexico (Hobbs) follows under the same name. Can I just use the 1657500 ID to represent both Texas and New Mexico on the same spreadsheet? Please, let me know.

Thanks so much,

[Ex. 6 - Personal Privacy]

Regulatory Analyst

Texland Petroleum

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

@texpetro.com

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:35:40 PM  
**Subject:** FW: Request for Extension: November 14, 2016 Information Collection Request (ICR) for Facility ID: 1783450  
[EPA ICR Extension Request.pdf](#)

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@fcpetroleum.com]  
**Sent:** Friday, January 13, 2017 3:25 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>  
**Cc:** [Ex. 6 - Personal Privacy]@fcpetroleum.com  
**Subject:** Request for Extension: November 14, 2016 Information Collection Request (ICR) for Facility ID: 1783450  
**Importance:** High

Dear Mr. Tsirigotis and Ms. Shine:

Four Corners Petroleum, LLC ("FCP") is in receipt of an Information Collection Request letter, EPA ICR No. 2548.01 for Facility ID: 1783450, from the U.S. EPA Office of Air Quality Planning and Standards dated November 14, 2016 (the "ICR"). While the ICR is dated November 14, 2016, it was not received by FCP until December 12, 2016 (see attached USPS tracking information). This letter is to request a sixty (60) day extension of FCP's deadline to respond to both Part 1 and Part 2 of the ICR survey request.

FCP requests this extension due to the fact that the ICR was not received until December 12<sup>th</sup>, and FCP's offices were not open for a portion of the months of December and January due to the national holidays. In addition, in December and January FCP staff are busy with end of year regulatory and internal reporting obligations. Further, as EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail.

This extension is necessary for FCP to fully evaluate the data requested in the ICR and to conduct the detailed reviews necessary to provide information on the requested facilities. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension

and allowing 120 days to respond to Part I and 240 days to respond to Part II (both commencing on December 12, 2016), EPA will be giving FCP much-needed time to provide accurate and complete responses to the ICR. Thank you for your consideration of this request.

See attachment for tracking information showing delivery date of 12/12/2016. A hard copy has also been mailed to your office.

Sincerely,

Ex. 6 - Personal Privacy

Operations Engineer

Four Corners Petroleum

Ex. 6 - Personal phone (mobile)

Ex. 6 - Personal Privacy (office)

Ex. 6 - Personal Privacy @fcpetroleum.com





**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:35:20 PM  
**Subject:** FW: Request for Extension to ICR - Facility ID 1116900  
[201701131359.pdf](#)

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@cdgops.com]  
**Sent:** Friday, January 13, 2017 2:52 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>  
**Cc:** [Ex. 6 - Personal Privacy] <[Ex. 6 - Personal Privacy]@cdgops.com>  
**Subject:** Re: Request for Extension to ICR - Facility ID 1116900

Please find attached our request for an extension to reporting timeline under the ICR pursuant to Section 114 of the Clean Air Act. In addition, a hard copy has been sent to the attention of Ms. Shine.

Sincerely,

[Ex. 6 - Personal Privacy]

CDG Operations

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:33:21 PM  
**Subject:** FW: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR  
[CountryMark ICR Extension Request.pdf](#)  
[CountryMark ICR Extension Request.pdf](#)

**From:** [Ex. 6 - Personal Privacy] [mailto:[Ex. 6 - Personal Privacy]@CountryMark.com]  
**Sent:** Friday, January 13, 2017 2:15 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>; [Ex. 6 - Personal Privacy] <[Ex. 6 - Personal Privacy]@CountryMark.com>  
**Subject:** Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

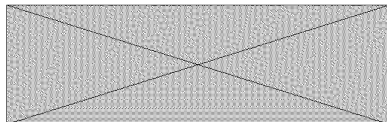
Peter,

Please find a copy of CountryMark Energy Resources, LLC request for an extension to complete the ongoing Information Collection Request. A copy of this document will also be mailed to your office.

Please contact me if you have any questions. We look forward to hearing from you.

Thank you,

[Ex. 6 - Personal Privacy] Manager, Regulatory Compliance | T: [Ex. 6 - Personal Privacy] | C: [Ex. 6 - Personal phone] | F: [Ex. 6 - Personal Privacy]  
CountryMark [Ex. 6 - Personal Privacy] Evansville, IN 47715 | [www.countrymark.com](http://www.countrymark.com)



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**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:33:01 PM  
**Subject:** FW: request for extension of section 114  
request for an extension for section 114.docx

**From:** [Ex. 6 - Personal Privacy] [mailto:[redacted]@campbellenergyllc.com]  
**Sent:** Friday, January 13, 2017 1:45 PM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>  
**Cc:** [Ex. 6 - Personal Privacy] [redacted]@gmail.com>  
**Subject:** request for extension of section 114

Brenda, Peter,

Please see our attached request for an extension on reporting under section 114 of the Clean Air Act. I appreciate your consideration and have a good weekend.

Sincerely,


[Ex. 6 - Personal Privacy] Campbell Energy LLC

Facility ID 1106550

---

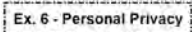
This email has been checked for viruses by Avast  
antivirus software.  
[www.avast.com](http://www.avast.com)

**To:** ICR[ICR@epa.gov]  
**From:** Shine, Brenda  
**Sent:** Fri 1/13/2017 8:32:49 PM  
**Subject:** FW: Extension

**From:** Quail Well Service [mailto:**Sent:** Friday, January 13, 2017 1:42 PM  
**To:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Extension

Good afternoon! I have been looking at the survey we are needing to submit and am not quite understanding everything on it. I am still learning everything with oil and gas wells so it takes me a little longer to grasp concepts. Also, I have been getting all of the end of year information gathered and processed, so my full attention has not been on the survey. The deadline came quicker than I expected. Could we please have an extension on submitting the survey? Is there something else we need to submit for an extension request? Please let me know if you need any further information or if I need to direct this elsewhere.

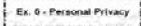
Thank you!

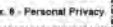
 Ex. 6 - Personal Privacy

Office Manager

Quail Well Service, Inc.

Email: 

Office:  Ex. 6 - Personal Privacy

Fax:  Ex. 6 - Personal Privacy

**To:** ICR[ICR@epa.gov]  
**Cc:** [REDACTED]@aol.com[REDACTED]@aol.com  
**From:** [REDACTED] Ex. 6 - Personal Privacy  
**Sent:** Fri 1/13/2017 8:28:45 PM  
**Subject:** ICR Extension Request for Western Reserves Oil Company, LLC - Facility ID 1712600  
[removed.txt](#)

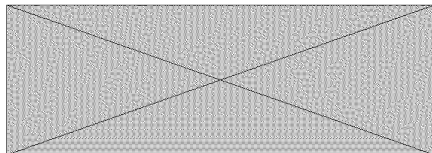
To whom it may concern:

Western Reserves Oil Company, LLC of Midland, Texas requests extensions of 60 days for Part 1 and 90 days for Part 2.

This brings the total due dates to 120 days from date of receipt. on or about December 5, for Part 1 and 270 days from date of receipt for Part 2.

Please provide confirmation that the extensions have been granted.

Thank you,



[REDACTED] Ex. 6 - Personal Privacy REM/CESCO | Sr. Air Project Manager – Permian Basin  
Direct [REDACTED] Ex. 6 - Personal Privacy Business [REDACTED] Ex. 6 - Personal Privacy | Cell [REDACTED] Ex. 6 - Personal Privacy [REDACTED] Ex. 6 - Personal Privacy @tetrattech.com  
Tetra Tech | Complex World, Clear Solutions™  
Oil & Gas [REDACTED] Ex. 6 - Personal Privacy Midland, TX 79707 | [tetrattech.com](http://tetrattech.com)

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**To:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Fri 1/13/2017 7:58:20 PM  
**Subject:** RE: BRG Lone Star, ID # 1085200

That would be great. I will look forward to receiving the 60 day extension confirmation letter.

Have a good weekend.

Thanks,

Ex. 6 - Personal Privacy

Regulatory Analyst

**BRG Energy Inc.**

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy @brgcorp.com

0 - Ex. 6 - Personal Privacy

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Friday, January 13, 2017 11:31 AM  
**To:** Ex. 6 - Personal Privacy @brgcorp.com  
**Subject:** RE: BRG Lone Star, ID # 1085200

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. We will mail you a confirmation letter.



Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 12:14 PM  
**To:** ICR <[ICR@epa.gov](mailto:ICR@epa.gov)>  
**Subject:** FW: BRG Lone Star, ID # 1085200

**From:** [Ex. 6 - Personal Privacy] [mailto: [redacted]@brgcorp.com]  
**Sent:** Friday, January 13, 2017 12:00 PM  
**To:** Shine, Brenda <[Shine.Brenda@epa.gov](mailto:Shine.Brenda@epa.gov)>  
**Subject:** BRG Lone Star, ID # 1085200

Good Morning Ms. Shine,

I hope everything is going well for you in North Carolina. I would imagine that you have been busy answering questions regarding the EPA Oil and Gas ICR.

BRG Lone Star (BRG) received our ICR letter on December 8, 2016, which we believe

started our 60 day time clock to submit Part One of the survey. This would make our effective due date February 6, 2017.

**Ex. 4 - CBI** BRG employees wear multiple hats often times juggling many tasks, this combined with the timing of the letter (around the Holidays), it has been challenging to focus on the survey while maintaining the day-to-day operations.

BRG respectfully requests a 30 day extension to submit Part One of the survey, extending our deadline to March 8, 2017. The additional time would allow us to ensure the accuracy of the data submitted.

We appreciate your consideration in this matter.

Thanks,

**Ex. 6 - Personal Privacy**

Regulatory Analyst

**BRG Lone Star**

**O -** **Ex. 6 - Personal Privacy**

**To:** [REDACTED]@ebresources.com; [REDACTED]@ebresources.com]  
**Cc:** ICR[ICR@epa.gov]  
**From:** Witosky, Matthew  
**Sent:** Fri 1/13/2017 8:06:36 PM  
**Subject:** extension confirmation

Hello [REDACTED]

This is confirmation that Angus Petroleum, E & B Natural Resource Management, and Elysium Jennings have received a 60 day extension to respond to EPA's Information Collection Request, Part 1. You now have 120 days from the day the certified letter was received. Most letters were received in the first week of December of 2016.

If you need an extension for part 2, should any facilities be selected for part 2, please contact us again at 888-372-8696.

Written confirmation of your extension will be sent by US mail.

Thank you for your help in completing our request for information. Contact us again if you need further assistance. Questions may also be directed to our email address for the ICR, which is [ICR@EPA.GOV](mailto:ICR@EPA.GOV)

Matthew Witosky

Fuels and Incineration Group

Sector Policies and Programs Division

Office of Air Quality Planning and Standards

EPA, RTP NC

919-541-2865

To: ICR[ICR@epa.gov]  
From: Ex. 6 - Personal Privacy  
Sent: Fri 1/13/2017 8:06:06 PM  
Subject: ICR

Gentlemen:

My Company hereby requests an extension of time in order to submit the requested data per your letter dated November 14, 2016. With the delivery of the letter during the holiday season, Ex. 4 - CBI and recent weather that caused office closure, we most likely will not have time to comply with your 60 day deadline. As I am sure you have heard from other Operators, we have a very heavy workload in the month of December as we process year end data for many partners and contractors.

I have contracted with a third party to put this information package together and they assure me they are close to having all of the necessary information gathered and are in the process of putting in the correct form for submittal.

Thanking you in advance for your consideration.

Sincerely,

Ex. 6 - Personal Privacy  
CO-MANAGER

REDLAND RESOURCES, LLC  
FACILITY ID 1549000  
e-GGRT INVITATION CODE WDAK-DLB8  
Ex. 6 - Personal Privacy  
OKLAHOMA CITY, OK 73127

To: ICR[ICR@epa.gov]  
From: Ex. 6 - Personal Privacy  
Sent: Fri 1/13/2017 7:18:41 PM  
Subject: RE: Extension

I apologize, the address you have on file is

Ex. 6 - Personal Privacy

Dallas, TX 75230.

However, we have moved to a new address shown below. Thank you.

Ex. 6 - Personal Privacy

Investment Manager

**F**IELDS Estate of Bert Fields, Jr.  
Fields Oil & Gas Company  
LLC  
Fields Cattle Company LLC

Ex. 6 - Personal Privacy  
Dallas, Texas 75230

Direct: Ex. 6 - Personal Privacy

Cell: Ex. 6 - Personal phone

Ex. 6 - Personal Privacy  
@thebff.net

**From:** Ex. 6 - Personal Privacy  
**Sent:** Friday, January 13, 2017 1:13 PM  
**To:** 'ICR' <ICR@epa.gov>  
**Subject:** RE: Extension

Thank you. Primary Facility ID is 1231450

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Friday, January 13, 2017 11:17 AM  
**To:** Ex. 6 - Personal Privacy <Ex. 6 - Personal Privacy>  
**Subject:** RE: Extension

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the primary facility ID from your letter, and verify your address, so that we may send you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 12:04 PM  
**To:** ICR <ICR@epa.gov>  
**Subject:** FW: Extension

**From:** Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy@thebff.net]  
**Sent:** Friday, January 13, 2017 11:52 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Extension

Good morning,

Our company received a letter in request for an ICR. We are glad to provide this to you, however I will need an extension on the 60 day period. Ex. 4 - CBI  
Ex. 4 - CBI it is going to take me a bit longer to gather the appropriate information. I am working with a specialist to help compile the information and get it to you in the correct manner. However, would you please allow an extended period of time? Thank you.

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

Investment Manager



**F**IELDS

Estate of Bert Fields, Jr.  
Fields Oil & Gas Company  
LLC  
Fields Cattle Company LLC

Ex. 6 - Personal Privacy

Dallas, Texas 75230

Direct:

Ex. 6 - Personal Privacy

Cell:

Ex. 6 - Personal phone

Ex. 6 - Personal Email

@thebff.net

**To:** ICR[ICR@epa.gov]  
**From:** Ex. 6 - Personal Privacy  
**Sent:** Fri 1/13/2017 7:14:37 PM  
**Subject:** RE: Extension

Thank you. Primary Facility ID is 1231450

**From:** ICR [mailto:ICR@epa.gov]  
**Sent:** Friday, January 13, 2017 11:17 AM  
**To:** Ex. 6 - Personal Privacy <Ex. 6 - Personal Privacy@thebff.net>  
**Subject:** RE: Extension

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the primary facility ID from your letter, and verify your address, so that we may send you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

[ICR@epa.gov](mailto:ICR@epa.gov)

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

**From:** Shine, Brenda  
**Sent:** Friday, January 13, 2017 12:04 PM  
**To:** ICR <ICR@epa.gov>  
**Subject:** FW: Extension

**From:** [Ex. 6 - Personal Privacy] [mailto:[redacted]@thebff.net]  
**Sent:** Friday, January 13, 2017 11:52 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Cc:** Shine, Brenda <Shine.Brenda@epa.gov>  
**Subject:** Extension

Good morning,

Our company received a letter in request for an ICR. We are glad to provide this to you, however I will need an extension on the 60 day period. [Ex. 4 - CBI]  
[Ex. 4 - CBI] it is going to take me a bit longer to gather the appropriate information. I am working with a specialist to help compile the information and get it to you in the correct manner. However, would you please allow an extended period of time? Thank you.

[Ex. 6 - Personal Privacy]

[Ex. 6 - Personal Privacy]

Investment Manager

**F**IELDS Estate of Bert Fields, Jr.  
Fields Oil & Gas Company  
LLC  
Fields Cattle Company LLC

**Ex. 6 - Personal Privacy**

Dallas, Texas 75230

Direct: Ex. 6 - Personal Privacy

Cell: Ex. 6 - Personal phone

Ex. 6 - Personal Email  
@thebff.net

ICR Help Desk,

Thank you for your prompt response to our request. In response to your discussion below, CRC would like to formally request a 60-day extension for the ICR Part 1 and a 90-day extension for the ICR Part 2.

Please note that we received another notification (Facility ID 3001290) on Jan 06, 2017. To facilitate data submission, CRC would prefer the extensions be from the date of the final letter received, in this case January 06, 2017. However, as of today, expected due dates are:

| ICR               | Receipt Date | Due Date     | Extension Due Date | Facility ID |
|-------------------|--------------|--------------|--------------------|-------------|
| Part 1            | Dec 12, 2017 | Feb 10, 2017 | Apr 11, 2017       | 1786350     |
| Part 2 (Prod/G&B) | Dec 12, 2017 | Jun 10, 2017 | Sep 08, 2017       | 2116000     |
| Part 2 (Proc)     | Jan 06, 2017 | Jul 05, 2017 | Oct 03, 2017       | 3001290     |

For any future notifications and/or additional correspondence, please use the following address:

California Resources Corporation  
Ex. 6 - Personal Privacy  
Bakersfield, CA 93311

If you have questions or additional information concerning the ICR process, please contact myself or Ex. 6 - Personal Privacy @crc.com. Your assistance and guidance is appreciated.

(Note: Attached is a Word document containing this correspondence in the event this email cannot be read.)

Ex. 6 - Personal Privacy PE  
Manager Air Quality/GHG



Ex. 6 - Personal Privacy  
Bakersfield, CA 93311

Ex. 6 - Personal Privacy  
crc.com

---

From: ICR [mailto:ICR@epa.gov]  
Sent: Friday, January 20, 2017 6:03 AM  
To: Ex. 6 - Personal Privacy  
Cc: ICR  
Subject: RE: Oil and Gas ICR Request

Ex. 6 - Personal Privacy

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letter.

We can grant you an extension of up to 90 days for Part 2. This brings your total due date to 270 days from the date of receipt of the Part 2 letter.

Please provide me with the Primary Facility IDs/Assigned Facility ICR IDs from your letters and verify your address, so that we can mail you a confirmation letter.

Thank you,

ICR Help Desk  
US Environmental Protection Agency  
ICR@epa.gov  
1-888-372-8696  
Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Ex. 6 - Personal Privacy [mailto:Ex. 6 - Personal Privacy@crc.com]  
Sent: Thursday, January 19, 2017 8:32 PM  
To: ICR <ICR@epa.gov>  
Subject: Oil and Gas ICR Request  
Importance: High

ICR Help Desk,

California Resources Corporation (CRC) has received several Information Collection Request (ICR) notifications for our oil and gas operations in California. To date, CRC has received nine (9) separate ICR notifications covering all aspects of the ICR Part 1 and 2.

CRC maintains Ex. 4 - CBI  
The ICR request is far beyond routine data collection typically associated with either air quality or GHG reporting activities. Furthermore, the data requested is in a format not conducive to traditional data collection activities.

As you are aware, preparations are currently underway to generate the annual GHG report due to your offices in March. Additionally, in California, there is State GHG reporting due in June. Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Our goal is to provide your office with the most accurate data possible. However, considering the breadth of the ICR, CRC believes the timeframe provided is not sufficient to accurately complete the data request. Therefore, we respectfully request a 60-day extension of the Part 1 and Part 2 requests. We feel this extension is necessary to properly address the data requests.

Please contact me if you questions or comments concerning this issue.

Ex. 6 - Personal Privacy PE

Manager Air Quality/GHG

Ex. 6 - Personal Privacy

Bakersfield, CA 93311

P:

Ex. 6 - Personal Privacy

M:

Ex. 6 - Personal Privacy @CRC.com

December 20, 2016

Peter Tsirigotis  
Director, Sector Policies and Programs Division  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
Mail Drop: 6101A  
Research Triangle Park, North Carolina 27711

**Re: Request to Extend ICR Reporting Due Dates  
Southwestern Energy Part 1 Surveys  
Southwestern Energy Part 2 Surveys**

Dear Mr. Tsirigotis:

Southwestern Energy is submitting this letter to request an extension to the reporting timeline for the "Information Collection Effort for Oil and Gas Facilities" ("ICR") Section 114 letters that we recently received. We understand the importance of the information requested in the ICR and support the agencies collection of the ICR data. However, we believe that additional time is warranted to assure that we can properly collect and verify the information prior to submittal to the EPA.

Southwestern Energy is one of the largest producers of natural gas in the lower 48 states. We own/operate

Ex. 4 - CBI

Ex. 4 - CBI Each of these wells is subject to the ICR Part 1 survey. We are subject to the ICR Part 2 survey for Ex. 4 - CBI well sites. We also are subject to the ICR Part 2 survey for one of the gathering system pipelines that our production company operates (as determined by the Random Tool Generator).

Southwestern Energy also operates gas gathering and booster stations in Ex. 4 - CBI under our midstream operations. We are subject to the ICR Part 2 survey for 6 of our gathering and booster stations.

We received the Section 114 letters by certified mail for both our Production and Midstream (Gathering and Boosting) operations on December 10, 2014. Based on the prescribed 60-day timeline for the Part 1 surveys, the submittal date would be February 8, 2017. Based on the prescribed 180-day timeline for the Part 2 surveys, the submittal date would be May 8, 2017.

Southwestern Energy is respectfully requesting a June 30, 2017 submittal date for both our ICR Part 1 surveys (Production) and Part 2 surveys (Production, Gathering and Booster Pipelines, Gathering and Booster Stations). Our request is based on multiple issues, with some of the key issues outlined below:

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- Southwestern Energy will need to complete the Part 1 survey for **Ex. 4 - CBI**. Although the Part 1 survey is limited in scope/detail, it still requires significant internal systems, communications and resources to compile the requested data. As an example, the Part 1 survey will require input from our Production Analyst, Engineering, Operations, and Environmental staff. Then the data will need to be aggregated and manually entered into the Part 1 survey sheet provided by the EPA as we will need to select the proper “drop down” selections in many of the data fields on a well by well basis. We simply do not see 60-days (including holidays and vacation) as adequate time to complete this task.
- Southwestern Energy will need to complete the Part 2 survey for **Ex. 4 - CBI**. 1 of our gathering and booster line “counties”, and 6 of our gathering and booster facilities. Although not nearly as many “facilities” are subject to the Part 2 survey as the Part 1 survey, the data elements including items such as component counts, measurements, sampling, and detail design data are much more extensive. Similar to the Part 1 survey, the Part 2 survey will require significant internal systems, communications, and resources to compile the requested data. In addition, we will need to engage with external parties (e.g. engine lease companies, equipment manufacturers) to obtain requested data. As with the Part 1 survey, the Part 2 survey will need to be aggregated and manually entered into the Part 2 survey sheet provided by EPA as we will need to select the proper “drop down” selections in many of the data fields on a well by well basis. The Part 2 survey will then need to be electronically uploaded via EPA eGGRT.
- In addition to the data acquisition, compilation, and report aggregation tasks, Southwestern Energy also needs time to review and validate that the information is correct for both the Part 1 and Part 2 surveys before submittal to the EPA. We recognize that this data needs to be as correct as possible for the agencies intended use.
- We acknowledge that the EPA communicated frequently throughout the ICR process. However, there were many changes that occurred to the Part 1 survey and Part 2 survey through their final issuance. These changes, although generally beneficial, still require us to review and confirm interpretations, and possibly establish protocols (e.g. sampling and measurement) before we can provide internal guidance as to the final data that is being requested and how it needs to be obtained.
- The ICR Part 1 and Part 2 surveys appear to be based on “calendar-days” and not “business-days”. This has significant impact to our resources (personnel) as the personnel that will be engaged are not assigned to work on weekends. Furthermore, the Section 114 letters were not issued until the busy Thanksgiving-Hanukah-Christmas season when our personnel enjoy holidays off and vacations (further limiting our “effective days” to complete the surveys). Even if the intent is to be based on “business-days”, we still see the need for extended timelines.
- The time commitment to complete the Part 1 and Part 2 surveys will have significant impact to our limited resources. In our current commodity priced environment, we have scaled back our



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personnel to support our base operations (e.g. production and gathering of natural gas). The resources needed to complete the Part 1 and Part 2 surveys will also need to complete their normally assigned duties during a very busy time of the year. We had commented on the significant resource burdens in our comment letter dated October 28, 2016 (attached).

- Finally, we believe that extending the deadlines (especially for Part 1 surveys) will allow us to check the Part 1 survey information against our 40 CFR Part 98 Subpart W information (report filing March 31, 2017).

In order to provide more accurate information, while allowing our staff to also work on their normally assigned duties, and based on the issues outlined above, we are respectfully request a June 30, 2017 submittal date for Southwestern Energy's Part 1 and Part 2 surveys.

If you have questions, please contact me at Ex. 6 - Personal Privacy [@swn.com](mailto:Ex. 6 - Personal Privacy@swn.com) or Ex. 6 - Personal Privacy

Sincerely,

**Ex. 6 - Personal Privacy**

Director, Corporate Environmental Programs

Attachment – SWN, Comments on Proposed Information Collection Request for Oil and Gas Facilities, October 28, 2016 submitted via e-filing at [www.regulations.gov](http://www.regulations.gov).

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October 28, 2016

Via e-filing at [www.regulations.gov](http://www.regulations.gov)

U.S. Environmental Protection Agency  
EPA Docket Center  
Mailcode-28221T  
Attention: Docket ID No. EPA-HQ-OAR-2016-0204  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

**Re: Comments on Proposed Information Collection Request for Oil and Gas Facilities**

Dear Docket Clerk:

Southwestern Energy (SWN) appreciates this opportunity to submit comments on the notice of proposed Information Collection Request for Oil and Gas Facilities as posted in the Federal Register on June 3<sup>rd</sup> and the second draft on September 29<sup>th</sup>, 2016

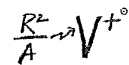
SWN is currently the third largest producer of natural gas in the lower 48 United States. We are an independent energy company primarily engaged in natural gas and crude oil exploration, development, and production. We also operate midstream services focused on natural gas gathering and marketing. As an oil and gas sector company, the Information Collection Request and potential future regulations on existing sources will significantly affect our operations.

SWN understands and supports the need for better factual information regarding the oil and gas sector operations as a prelude to considering and or developing regulations for existing sources. We therefore understand and support the Information Collection Request which may provide EPA with better factual information. However, we believe that the Information Collection Request imposes an undue burden on the oil and gas sector in the manner and timing in which it is being implemented.

**Part 1 ICR Survey Timelines and Resource Estimates**

**We recommend that EPA extends a more reasonable reporting timeline for the Part 1 surveys which will allow operators adequate time to compile and report better factual and more accurate data.**

The proposed ICR requiring Part 1 surveys to be due within 30-days of request is an unreasonably short response time. In the ICR Supporting Statement, EPA estimates that the Part 1 survey will require approximately 7.76 hours per facility (aka well pad) to complete. Assuming that 7.76 hours is a fair assessment of time to complete each Part 1 survey, the resource impacts to SWN are approximately 19,400 hours for our Production Operations. Furthermore, assuming that SWN (and other companies) are given 30 “business” days to complete the Part 1 survey, and assuming a standard work hour day of 8



hours, which is equivalent to 240 hours. This means in order to meet a 30 day timeline for Part 1 surveys, SWN would need to commit Ex. 4 - CBI to this effort. This represents at least Ex. 4 - CBI. Furthermore, if the 30-day period is based on “calendar days” the required personnel increases as our technical employees are not expected to work over weekends. Calendar days would Ex. 4 - CBI adding holidays would increase the employee count again. Furthermore, this segment of our workforce is vital to our operations and could not be dedicated full time to this task to the detriment of their regular responsibilities.

SWN has reviewed the Part 1 survey form and believes that we have the information necessary to complete the significant majority of the draft Part 1 survey. However, that information is not readily available in a singular data base or asset tracking system. Furthermore the Part 1 survey form is pre-populated with “drop down” selections. While we believe the intent of the “drop down” selections was/is to minimize resource impacts, it can actually have an adverse effect due to the manual line by line entry which will be required. With the various SWN personnel needed to locate, aggregate, compile and individually enter the data into the Part 1 survey for approximately 2,500 well pads, we believe the resource impacts could easily be doubled (e.g. 38,000+ hours, 160 full time technical staff, > 20% of our technical workforce).

## Part 2 ICR Survey Timelines and Resource Estimates

**We recommend that EPA extends a more reasonable reporting timeline for the Part 2 surveys which will allow operators adequate time to compile and report better factual and more accurate data.**

The more detailed Part 2 surveys would be due within 120-days of request. EPA has estimated approximately 33 hours per facility to complete the Part 2 survey. Because the “population” or number of “facilities” that will be subject to Part 2 survey is “unknown” it is impractical to conduct a resource estimate similar to the Part 1 survey. However, unlike the Part 1 survey, the Part 2 survey requires a significant amount of information which a company may not have and for which considerable time and expense will be required to obtain. As an example, the Part 2 survey requires a detailed count of “components” (e.g. valves, flanges, connectors, PRVs, etc) as well as categorized by major equipment type (e.g. wellhead, separator, compressor, tanks, etc). In addition, Part 2 requires sampling of liquids at sources which may not be equipped for such sampling. Therefore facility “modifications” may be required to facilitate such sampling. These “modifications” may require engineering review, design and approval. Additional time would be required to make the necessary modifications and obtain the sample. These are a couple of examples of Part 2 survey elements which may significantly impact the resources needed to complete the survey.

As expressed above, SWN supports the acquisition of factual data to assist in the evaluation of impacts from proposed regulation for oil and gas existing sources. We find the ICR in its proposed form to be overly burdensome and the resource assessments and timelines (30-days/120-days) to be unreasonable. We recommend that the agency consider streamlining both the Part 1 and Part 2 surveys and utilize information that is already publically available (e.g. 40 CFR Part 98 Greenhouse Gas Inventory Rule

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Reporting). We also recommend that the agency extends the submittal deadlines to at least 180-days for Part 1 surveys and 180-days for Part 2 surveys.

We appreciate the opportunity to provide these comments and would be glad to meet with you to discuss our comments. If you have questions please contact me Doug Jordan at [douglas\\_jordan@swi.com](mailto:douglas_jordan@swi.com) or 832-796-7628 or Roy Hartstein at [roy\\_hartstein@swi.com](mailto:roy_hartstein@swi.com) or 832-796-4875.

Sincerely,

**Ex. 6 - Personal Privacy**

Douglas Jordan

Director Corporate Environmental Programs  
V+ Resource Development

$$\frac{R^2}{A} \rightarrow V^+$$

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wisely Investing the cash flow from our  
underlying Assets, will create Value+®



Devon Energy Corporation  
333 West Sheridan Avenue  
Oklahoma City, OK 73102-5015

405 235 3611 Phone  
www.devonenergy.com

January 19, 2017

Peter Tsirigotis  
Director, Sector Policies and Programs Division  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Mail Code: D205-01  
Research Triangle Park, NC 27709

Re: Request for an Extension to Data Submittal for Part 2 of the Information Collection Effort for Oil and Gas Facilities, EPA-HQ-OAR-2016-0204

Dear Mr. Tsirigotis:

Devon Energy Corporation ("Devon") respectfully requests a 120-day extension (for a total response time of 300-days) to provide data in response to the U.S. Environmental Protection Agency's ("EPA's") Part 2 Information Collection Request ("ICR") we received on December 5, 2016.

Upon further review of the Part 2 ICR, the existing one hundred and eighty (180)-day response time does not give Devon sufficient time to obtain complete and accurate data that will provide EPA the specificity it needs. Devon's facilities subject to Part 2 are Ex. 4 - CBI requiring more time to schedule, coordinate and participate in the sample collection effort. Also, the information needed for Part 2 requires the use of a sample collection method that is different than what Devon typically uses requiring more time to analyze the results to ensure they are correct.

In addition, EPA's ICR request comes at a very demanding time. Our staff and resources are significantly limited due to other important reporting deadlines already imposed by EPA and state air agencies for the first quarter of 2017. These existing reporting deadlines include EPA's Part 1 ICR, the annual report for New Source Performance Standards OOOO, the Greenhouse Gas Subpart W report, the EPCRA Tier 2 report, and reporting for numerous state air emission inventories. The same staff responsible for the data collection, assimilation, and reporting for these programs would be responsible to gather the ICR Part 2 data.

Devon appreciates EPA's consideration of our extension request and looks forward to providing meaningful information that will better inform EPA's decision-making process for future rulemakings on this issue.

Sincerely,

Ex. 6 - Personal Privacy

Manager EHS

cc: Brenda Shine (shine.brenda@epa.gov)

ED\_001121\_00000242